

1 **JODI D. THORP**

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7
8 Counsel for Mr. Motivosyan

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
11 **(HONORABLE ROGER T. BENITEZ)**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ARSEN MOTIVOSYAN,

16 Defendant.

) U.S.D.C. No. 08CR1455-BEN

) Date: June 30, 2008

) Time: 2:00 p.m.

) NOTICE OF MOTIONS AND MOTIONS TO:

-) (1) DISMISS INDICTMENT DUE TO
) MISINSTRUCTION OF THE GRAND JURY;
) (2) PRESERVE EVIDENCE;
) (3) COMPEL DISCOVERY;
) (4) SEVER DEFENDANTS;
) (5) SUPPRESS STATEMENTS; AND
) (6) GRANT LEAVE TO FILE FURTHER
MOTIONS

19
20 TO: KAREN P. HEWIT, UNITED STATES ATTORNEY, AND
21 REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY.

22 PLEASE TAKE NOTICE that on June 30, 2008, at 2:00 p.m. or as soon thereafter as counsel
23 may be heard, Defendant Arsen Motivosyan, by and through his counsel, Jodi Thorp will ask this Court to
24 enter an order granting the following motions.

25 **MOTIONS**

26 Defendant Arsen Motivosyan, by and through his counsel, Jodi D. Thorp, Inc., moves this Court
27 pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable
28

1 statutes, case law, and local rules for an order to:

- 2 (1) Dismiss Indictment Due to Misinstruction of the Grand Jury;
- 3 (2) Preserve Evidence;
- 4 (3) Compel Discovery;
- 5 (4) Sever Defendants;
- 6 (5) Suppress Statements; and
- 7 (6) Grant Leave to File Further Motions.

8 This motion is based upon the instant motions and notice of motions, the attached statement of facts
9 and memorandum of points and authorities, the files and records in the above-captioned matter, and any and
10 all other materials that may come to this Court's attention prior to or during the hearing of these motions.

11 Respectfully submitted,

12
13 Dated: June 16, 2008

s/ Jodi Thorp
JODI THORP
Counsel for Mr. Motivossyan

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Counsel for Mr. Motivossyan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,)	CASE NO. 08CR1455-BEN
)	
Plaintiff,)	
)	DATE: June 30, 2008
v.)	
)	TIME: 2:00 p.m.
ARSEN MOTIVOSYAN)	
)	
Defendant.)	CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

U S Attorney CR
Efile.dkt.gc2@usdoj.gov

DATED: June 16, 2008

/s/ Jodi D. Thorp
JODI D. THORP
Counsel for Mr. Motivossyan